

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION

JUAN SILVA VAZQUEZ, SR.,  
Movant

§  
§  
§  
§  
§  
§  
§  
§  
§

#ICE-HIS-LD-2021-00617

V.

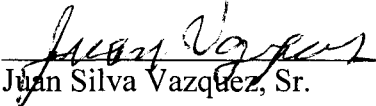
H.S.I. AND D.O.J.  
Respondent

**UNITED STATES DEPARMENT OF JUSTICE SWORN STATEMENT OF MOVANT**

I, Juan Silva Vazquez Sr., am/was previously a customer of Security Service Federal Credit Union and I am the customer whose records are being requested by the Government. The Financial records sought by Homeland Security Investigations are not relevant to the legitimate law enforcement inquiry stated in the Customer Notice that was sent to me because I am not involved in any illegal matter, nor am I part of the indictment and pending legal investigation of Luis Lauro Garza, nor was I any part of the indictment against Mr. Garza.

Therefore, none of my personal financial records are a part of any pending legal case or matter or part of the indictment and therefore, should not be disclosed because there has not been substantial compliance with the Right To Financial Privacy Act of 1978 in that my financial transactions would have no information relevant to any liability for taxes, fees, penalties or forfeitures or should not be disclosed on the following other legal basis as my personal financial information has no relevance to the case and indictment against Mr. Garza, who is related by marriage.

On this the 24<sup>th</sup> of May, 2021, I declare under penalty of perjury that the foregoing is true and correct.

  
Juan Silva Vazquez, Sr.

1. To (Name, Address, City, State, Zip Code) Security Service Federal Credit Union CT Corporation Systems CT Corporations Systems 1999 Bryan St. Suite 900 Dallas, TX 75201	<b>DEPARTMENT OF HOMELAND SECURITY</b>  <b>IMMIGRATION ENFORCEMENT</b> <b>SUBPOENA</b> <b>to Appear and/or Produce Records</b> 8 U.S.C. § 1225(d), 8 C.F.R. § 287.4
Subpoena Number ICE-HSI-LD-2021-00617	
2. In Reference To <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;"> <u>8USC1324</u>  <small>(Title of Proceeding)</small> </div> <div style="text-align: center;"> <u>LD15BR21LD0026</u>  <small>(File Number, if Applicable)</small> </div> </div>	

By the service of this subpoena upon you, **YOU ARE HEREBY SUMMONED AND REQUIRED TO:**

- (A) ☐ **APPEAR** before the U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), or U.S. Citizenship and Immigration Services (USCIS) Official named in Block 3 at the place, date, and time specified, to testify and give information relating to the matter indicated in Block 2.
- (B) ☒ **PRODUCE** the records (books, papers, or other documents) indicated in Block 4, to the CBP, ICE, or USCIS Official named in Block 3 at the place, date, and time specified.

Your testimony and/or production of the indicated records is required in connection with an investigation or inquiry relating to the enforcement of U.S. immigration laws. Failure to comply with this subpoena may subject you to an order of contempt by a federal District Court, as provided by 8 U.S.C. § 1225(d)(4)(B).

3. (A) CBP, ICE or USCIS Official before whom you are required to appear  <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p>Name                      Brian C. Huffman</p> <p>Title                        Special Agent</p> <p>Address                    Homeland Security Investigations                                             109 Shiloh Drive                                             Suite 200                                             Laredo, TX 78045</p> <p>Telephone Number    956-357-2575    Fax Number (Not Available)</p> </div> <div style="width: 35%; text-align: center; vertical-align: top;"> <p>(B) Date</p> <p>May 24, 2021</p>    <p>(C) Time</p> <p>9:00 AM</p> </div> </div>
4. Records required to be produced for inspection  Please see attached continuation page.



If you have any questions regarding this subpoena, contact the CBP, ICE, or USCIS Official identified in Block 3.

5. Authorized Official <div style="text-align: center;"> <b>ALEJANDRO M AMARO</b>  <small>(Signature)</small> </div>	<small>Digitally signed by          ALEJANDRO M AMARO          Date: 2021.05.10          15:49:28 -05'00'</small>
<b>Alejandro M. Amaro</b> <small>(Printed Name)</small>	
<b>Assistant Special Agent In Charge</b> <small>(Title)</small>	
<small>(Date)</small>	

**A. CERTIFICATE OF SERVICE**

I certify that on \_\_\_\_\_, I served this subpoena on the witness named in Block 1 in the following manner:  
(Date)

\_\_\_\_\_  
(Details of how service was effected)

\_\_\_\_\_  
(Signature of Official Serving Subpoena)

\_\_\_\_\_  
(Printed Name of Official Serving Subpoena)

\_\_\_\_\_  
(Title of Official Serving Subpoena)

**B. ACKNOWLEDGMENT OF RECEIPT**

I acknowledge receipt of a copy of the subpoena on the front of this form.

Signature

Title

Date

Time

☐ a.m.  
☐ p.m.

1. To (Name, Address, City, State, Zip Code)  
 Security Service Federal Credit Union  
 CT Corporation Systems  
 CT Corporations Systems  
 1999 Bryan St. Suite 900  
 Dallas, TX 75201

## DEPARTMENT OF HOMELAND SECURITY

**IMMIGRATION ENFORCEMENT  
 SUBPOENA (Continuation)  
 to Appear and/or Produce Records  
 8 U.S.C. § 1225(d), 8 C.F.R. § 287.4**

Subpoena Number  
 ICE-HSI-LD-2021-00617

## 4. Records required to be produced for inspection (continued)

The following applies if checked:



**Child Exploitation:** This subpoena is in regard to an investigation involving Child Exploitation and/or transmission of Child Pornography via the internet. Please do not disclose/notify the user of the issuance of this subpoena. Disclosure to the user could impede an investigation or obstruct justice.

Please see the attached document.

See Attachment A.

**Method of Response:****Preferred:**

Return the requested records in an accessible data file format such as ".XLS", ".CSV", ".TXT", or ".PDF". The data file(s) should be delivered via e-mail to Special Agent Brian C. Huffman at Brian.C.Huffman@ice.dhs.gov.

NOTE: The ICE e-mail system limits incoming messages containing file attachments to 10 MB. For larger files send the subpoena response in multiple e-mail messages.

**Alternates:**

The records should be delivered to Special Agent Brian C. Huffman at U.S. Immigration and Customs Enforcement, Homeland Security Investigations, 109 Shiloh Drive, Suite 200, Laredo, TX 78045.

If you have questions, please contact Special Agent Brian C. Huffman at 956-357-2575.

*You are requested not to disclose the existence of this subpoena for an indefinite period of time. Any such disclosure will impede this investigation and thereby interfere with the enforcement of federal law.*

End of Document

ATTACHMENT TO SUBPOENA ISSUED TO: Security Service Federal Credit Union  
(SSFCU)

Responsible Officer/Custodian of Records

ALL OPEN AND CLOSED ACCOUNTS

From to September 1, 2016 to April 30, 2021.

All records in DIGITAL FORMAT pertaining to the following business entities whether held jointly or severally or as trustee or fiduciary as well as custodian, executor or guardian as well as any other entity in which these individuals or entities may have a financial interest:

SSFCU Loan Number: 6269698020  
Loan Holder: Juan Silva Vazquez Sr. (DOB: 03/28/1955)  
Social Security Number: 465-31-8933  
Texas Driver License Number: 11535087  
Phone Number: (956) 712-8284  
Street Name: 3202 Hereford Drive, Laredo, TX 78046  
Street Name: 1018 Espejo Molina Road, Laredo, TX 78046

To include all accounts in which these individuals had signatory authority and/or the right of withdrawal.

These records should include but are not limited to:

**SAVINGS ACCOUNT RECORDS:** Including signature cards, ledger cards or records reflecting dates and amounts of deposits, withdrawals, interest, debit and credit memos, deposit slips, checks deposited, withdrawal slips, and checks issued for withdrawals, Forms 1099 issued.

**CHECKING ACCOUNT RECORDS:** Including signature cards, bank statements, deposit slips, checks deposited, checks drawn on the account, records pertaining to all debit and credit memos, Forms 1099 issued.

**LOAN RECORDS:** Including applications, financial statements, loan collateral, credit and background investigations, loan agreements, notes or mortgages, settlement sheets, contracts, checks issued for loans, repayment records, including records revealing the date, amount and method of repayment (cash or check, wired funds, payment processing services, CallPlus, Western Union, money transmitter services, Automated Clearing House, money orders, cashier's checks etc.), checks used to repay loans and a record disclosing the total amount of discount or interest paid annually, records of any liens, loan correspondence files, and internal bank memoranda. Also include records identifying the source and originating account identifiers of the payment methods used in each transaction (cash or check, wired funds, payment processing

services, CallPlus, Western Union, money transmitter services, Automated Clearing House, money orders, cashier's checks etc).

**CREDIT CARD RECORDS:** Including customer's application, signature card, credit or background investigations conducted, correspondence, monthly billing statements, individual charge invoices, repayment records disclosing the dates, amounts and method (cash or check) of repayment, checks used to make repayments (front and back).

**PURCHASES OF BANK CHECKS:** Purchases of bank checks, cashier, teller, travelers' check records, or money order records including the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

**IP ADDRESS RECORDS:** All records evidencing or related to remote access to or control of the account(s), including but not limited to the Internet Protocol (IP) log history, dates/times accounts accessed, duration of login, user identification numbers, e-mail addresses provided, date/time of account(s) creation date, and registered mobile number(s).

**OTHER RECORDS:** Records of certified checks, wire transfers, or collections, letters of credit, bonds and securities purchased through your bank, savings bond transactions and investment accounts. Such records that disclose the date and amount of the transaction, method (cash or check) and source of payment, instruments and statements of transactions.

All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

**RECORD FORMAT:** Records are requested in electronic form.

Any questions regarding this subpoena can be directed to Special Agent Brian Huffman at 956-357-2575.

The records should be returned to:

Homeland Security Investigations (HSI)  
Special Agent Brian Huffman  
109 Shiloh Drive, Suite# 200  
Laredo, TX 78045  
(956)-357-2575  
Brian.c.huffman@ice.dhs.gov